

Lawrence A. Organ (SBN 175503)
Julianne K. Stanford (SBN 290001)
Kira Brekke (SBN 339757)
CALIFORNIA CIVIL RIGHTS LAW
GROUP
332 San Anselmo Avenue
San Anselmo, CA 94960
Tel. (415) 453-4740
Fax (415) 785-7352
Email: larry@civilrightsca.com
julianne@civilrightsca.com
kira@civilrightsca.com

Matthew C. Helland, (SBN 250451)
helland@nka.com
NICHOLS KASTER, LLP
235 Montgomery St., Suite 810
San Francisco, CA 94104
Telephone: (415) 277-7235
Facsimile: (415) 277-7238

Attorneys for Plaintiff and the Putative Class

Additional Counsel on the Following Page

Anna P. Prakash, MN Bar No. 0351362*
aprakash@nka.com
Ricardo Perez, MN Bar No. 0505964*
rperez@nka.com
NICHOLS KASTER, PLLP
4700 IDS Center, 80 South 8th Street
Minneapolis, MN 55402
Telephone: (612) 256-3200
Fax: (612) 215-6870
*Admitted Pro Hac Vice

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Reyna Dempsey, individually, on behalf of
others similarly situated, and on behalf of the
general public,

Plaintiff,

v.

United Healthcare Services, Inc., and DOES
1 through 10, inclusive,

Defendants.

Case No. 5:24-cv-00425-EKL-VKD

**SECOND STIPULATED REQUEST TO
EXTEND CLASS CERTIFICATION AND
SUBSEQUENT DEADLINES**

1 GIBSON, DUNN & CRUTCHER LLP
2 HEATHER L. RICHARDSON, SBN 246517
HRichardson@gibsondunn.com
3 LAUREN M. BLAS, SBN 296823
LBlas@gibsondunn.com
4 JENNAFER M. TRYCK, SBN 291088
Jtryck@gibsondunn.com
5 333 South Grand Avenue
Los Angeles, California 90071
6 Telephone: (213) 229-7000
Fax: (213) 229-7520
7 *Attorneys for Defendants United HealthCare Services, Inc.*

Pursuant to Local Rules 6-1, 6-2, and 7-12, Plaintiff Reyna Dempsey, individually and on behalf of others similarly situated, and on the behalf of the general public (“Plaintiff”), and Defendant United Healthcare Services, Inc. (“Defendant” or “United”) (collectively, “the Parties”) jointly move to enlarge the deadline for Plaintiff to file her motion for class certification and subsequent deadlines flowing therefrom. Specifically, the parties propose the following deadlines:

Event	Current Deadline	Proposed Deadline
Deadline to file motion for class certification	December 12, 2025	March 31, 2026
Deadline to file opposition to class certification	January 23, 2026	May 4, 2026
Deadline to file reply in support of class certification	February 24, 2026	May 26, 2026
Class certification hearing and case management conference	April 8, 2026	<i>To be set by the Court</i>
Close of fact discovery	August 28, 2026	November 2, 2026
Close of expert discovery	September 30, 2026	December 1, 2026
Deadline to file dispositive and Daubert motions	November 20, 2026	January 15, 2027
Deadline to file oppositions to dispositive and Daubert motions	December 30, 2026	February 15, 2027
Deadline to file replies in support of dispositive and Daubert motions	January 21, 2027	March 1, 2027
Last day to hear dispositive and Daubert motions	February 17, 2027	April 16, 2027

Accordingly, considering all of the currently set deadlines, the parties’ proposal will result in a two-month extension of the current case schedule. There is good cause for this extension, as discussed herein.

First, the parties devoted substantial time, energy, and resources toward preparing for and participating in mediation on August 26, 2025. Although the mediation did not result in settlement, it was productive and early discovery conducted ahead of the mediation informed and advanced discussions significantly in the parties’ ongoing meet and confer discussions.

1 Second, the parties met and conferred on October 1 after Defendant's latest supplemental
2 production and written responses, which responses were served on September 30. The parties'
3 efforts to reach agreement are ongoing.

4 Third, the meet and confer process has raised numerous questions by Plaintiff that require
5 Defendant's counsel to consult with their client to provide responses to those questions, including
6 issues related to the scope of the potential class and the location and maintenance of claims and
7 demographic data. Defense counsel is in the process of completing their inquiry into Plaintiff's
8 questions.

9 Fourth, the parties are in the process of negotiating an ESI protocol. It is clear from the
10 parties' discussions to date that they will need to make substantial efforts to ensure a diligent and
11 effective protocol aimed at the data necessary for class certification briefing. Even if agreement is
12 reached in short order, additional time will be needed to implement the protocol and complete
13 related productions.

14 Fifth, this is only the second request to enlarge the class certification briefing deadlines.
15 The parties have complied with all other Court deadlines, including expert disclosures and the
16 initial ADR session, demonstrating diligence and good faith. Indeed, the parties have been working
17 cooperatively to provide each other the necessary information to build their case and defenses;
18 however, the process has taken longer than expected due to some disagreements on the scope of
19 discovery, the complexity of the questions at issue, vendor issues, and the data-intensive nature of
20 discovery.

21 Finally, the requested extension results in a modest overall adjustment of approximately
22 two months and will not otherwise disrupt the Court's schedule or prejudice any party.

23 Accordingly, the parties respectfully request that the Court enter an order enlarging the
24 deadline for Plaintiff's Motion for Class Certification to March 31, 2026, and adjusting subsequent
25 deadlines as proposed above.

1
2 Dated: October 15, 2025

Respectfully submitted,

3 **NICHOLS KASTER, PLLP**

4 By: /s/Ricardo G. Perez

5
6 Dated: October 15, 2025

Attorneys for Plaintiff Reyna Dempsey
Respectfully submitted,

7 **GIBSON, DUNN & CRUTCHER LLP**

8
9 By: /s/Lauren Blas

10 Attorneys for Defendants United Healthcare
Services, Inc.

ATTORNEY ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I, Ricardo Perez, hereby attest that concurrence in the filing of this document has been obtained from counsel for Defendant United Healthcare Services, Inc.

Dated: October 15, 2025

NICHOLS KASTER, PLLP

By: /s/Ricardo G. Perez
Ricardo G. Perez

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that the following case deadlines shall apply:

Event	Deadline
Deadline to file motion for class certification	March 31, 2026
Deadline to file opposition to class certification	May 4, 2026
Deadline to file reply in support of class certification	May 26, 2026
Class certification hearing and case management conference	June 24, 2026
Close of fact discovery	November 2, 2026
Close of expert discovery	December 1, 2026
Deadline to file dispositive and Daubert motions	January 15, 2027
Deadline to file oppositions to dispositive and Daubert motions	February 15, 2027
Deadline to file replies in support of dispositive and Daubert motions	March 1, 2027
Last day to hear dispositive and Daubert motions	April 16, 2027 April 14, 2027

IT IS SO ORDERED.

Dated: October 15, 2025


 THE HONORABLE EUMI K. LEE
 UNITED STATES DISTRICT COURT JUDGE